

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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JUL 30 1992

In the Matter of)

)
Amendment of Section 73.202(b),
Table of Allotments,
FM Broadcast Stations.)

RM- 8061

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

)
Lumberton, Mississippi)

To: Mass Media Bureau (Policy & Rules)

PETITION FOR RULE MAKING

Stone-Lamar Broadcast Services Corporation, licensee of FM station WLUN, Lumberton, Mississippi, (hereinafter "WLUN") by its attorney, respectfully petitions for rule making so as to substitute Channel 237C1 in place of Channel 237C2 at Lumberton, Mississippi. In support thereof, the following is shown.

WLUN, as a Class C2 station, is limited in its power and coverage. According to the Engineering Statement of Bromo Communications, Inc., attached hereto, an upgrade to Class C1 status will permit the station to serve a larger area and nearly 350,000 more listeners. The engineering statement shows further that WLUN's proposal meets all Commission spacing requirements for operation on Channel 237C1 from reference coordinates of North Latitude 30° 39' 34" and West Longitude 89° 09' 59".¹ This imposes a site restriction 46.8 kilometers south-southeast of Lumberton. The engineering statement demonstrates that there is a significant area available which meets all spacing require-

¹As Bromo's report states, this rule making proposal is made possible by the Commission's Report and Order in MM Docket No. 90-563 (DA 92-885, released July 15, 1992) amending the FM Table of Allotments to specify Channel 238C3 at Thomasville, Alabama.

ments and yields city-grade coverage of Lumberton. Thus, the public interest will be served by adoption of the rule making proposed herein.

WLUN will promptly apply for a construction permit for the improved facilities upon favorable Commission action on this petition, and will promptly construct the new facilities upon grant of the application.

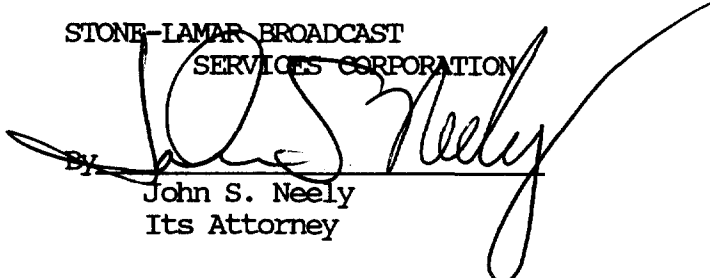
In view of the above, the Commission should amend Section 73.202(b) as follows:

	<u>Present</u>	<u>Proposed</u>
Lumberton, Mississippi	237C2	237C1

Respectfully submitted,

STONE-LAMAR BROADCAST
SERVICES CORPORATION

By


John S. Neely
Its Attorney

July 30, 1992

Miller & Miller, P.C.
P.O. Box 33003
Washington, DC 20033

PETITION FOR RULE MAKING
STONE-LAMAR BROADCAST
SERVICES CORPORATION
SUBSTITUTE CH 237C1 FOR CH 237C2
LUMBERTON, MISSISSIPPI
July 1992

Technical Exhibit
TE-1

Bromo Communications, Inc.
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St. Simons Island, Georgia 31522
(912) 638-5608

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PETITION FOR RULE MAKING
STONE-LAMAR BROADCAST
SERVICES CORPORATION
SUBSTITUTE CH 237C1 FOR CH 237C2
LUMBERTON, MISSISSIPPI
July 1992

TECHNICAL STATEMENT

1. This technical statement and the attached exhibits were prepared on behalf of Stone-Lamar Broadcast Services Corporation ("Stone-Lamar"), licensee of radio station WLUN, Channel 237A, Lumberton, Mississippi. Stone-Lamar is requesting that the Commission amend its Table of FM Allotments by substituting Channel 237C1 for Channel 237C2 at Lumberton, Mississippi. Further, Stone-Lamar asks that WLUN be ordered to change channels. It should be noted that Stone-Lamar also holds an outstanding construction permit, File #BPH-901116IC, to upgrade WLUN to a C2 facility, as ordered in MM Docket #89-557.

BACKGROUND

2. The ability of WLUN to be upgraded to a C1 facility at Lumberton is due to the conclusion of MM Docket #90-563 which upgraded station WJDB, Thomasville, Alabama, to Channel 238C3 from Channel 237A.¹ The changing of channels at Thomasville facilitates the herein requested upgrade.

¹ The allotment of Channel 238C3 to Thomasville, Alabama is effective August 28, 1992.

DISCUSSION

3. Channel 237C1 can be allotted to Lumberton, Mississippi, at hypothetical reference coordinates North Latitude 30° 39' 34" and West Longitude 89° 09' 59". This represents a site restriction of 46.8 kilometers south-southeast of the community in order to avoid shortspacing WKQB, Channel 238C, Jackson, Mississippi, WQNZ, Channel 236C, Natchez, Mississippi, and WBBN, Channel 240C2, Taylorsville, Mississippi. Exhibit #1 is a usable area study visually demonstrating the area in which a transmitter site could be located on Channel 237C1. Exhibit #2 is a Channel 237C1 allocation analysis from the proposed allocation site. Both exhibits assume that WJDB is operating on Channel 238C3 at Thomasville, Alabama. From the herein noted reference site a 3.16 mV/m contour would be delivered to Lumberton.

4. Therefore, Stone-Lamar requests the following amendment to §73.202(b) of the Commission's rules:

Lumberton, Mississippi

Present

237C2

Proposed

237C1

PUBLIC INTEREST ASPECTS

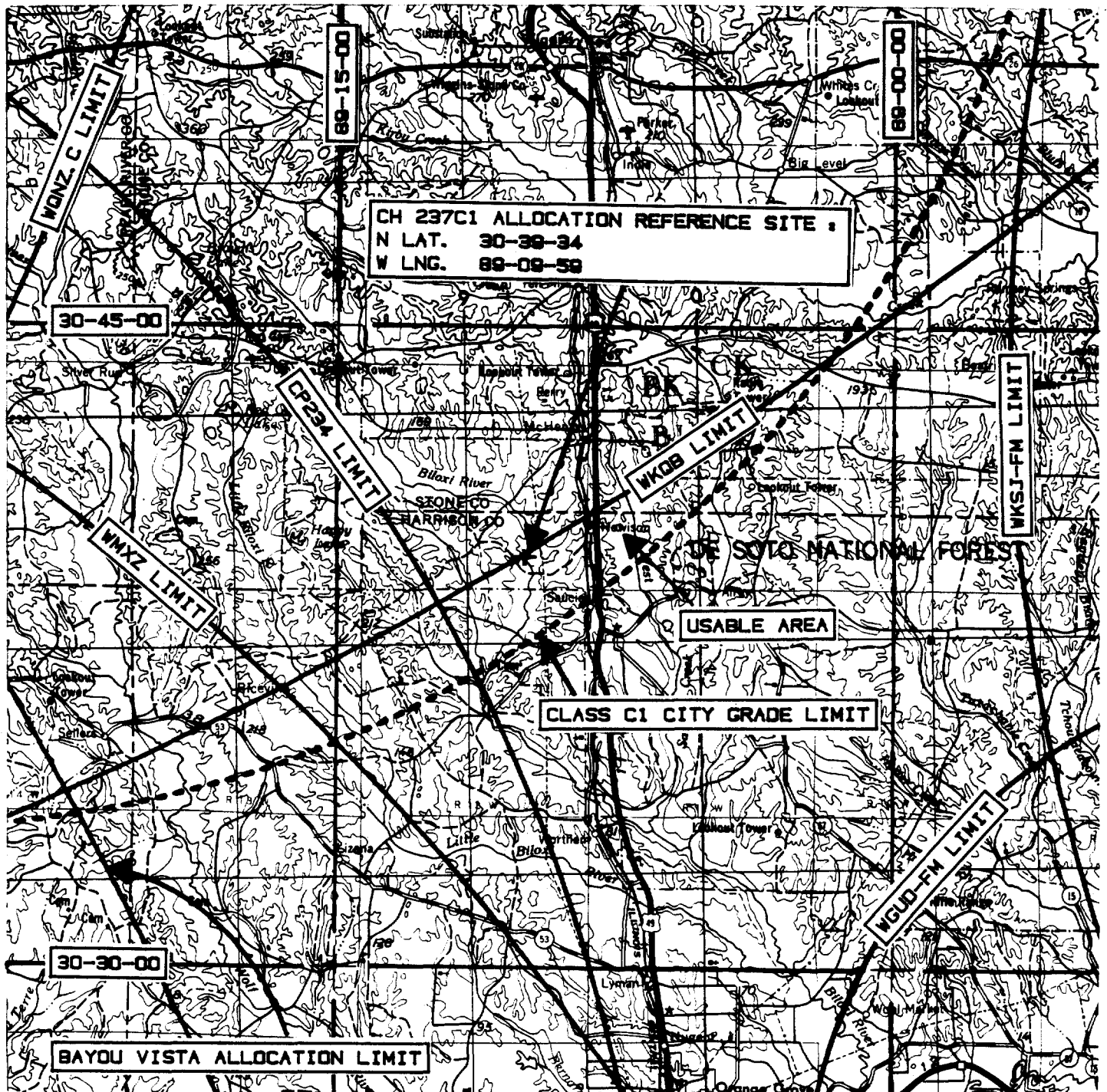
5. WLUN, operating as a maximum Class C1 facility from the proposed reference site, will provide 1.0 mV/m service to 472,087 persons in 16,418.3 square kilometers.² This represents an increase of 348,194 persons and 7,921.7 square kilometers over its authorized C2 construction permit.³

6. When Channel 237C1 is allotted to Lumberton, Mississippi, Stone-Lamar will file, on a timely basis, an application to modify its outstanding construction permit to specify operation on Channel 237C1 at Lumberton, Mississippi.

7. The foregoing technical statement was prepared on behalf of Stone-Lamar Broadcast Services Corporation by Bromo Communications, Inc., its Technical Consultant. All information contained herein is true and accurate to the best of our belief and knowledge. Should questions arise during consideration of this proposal, we would welcome the opportunity to discuss the matter by phone at (912) 638-5608.

² 1990 Census figures from (PL 94-171 files).

³ WLUN C2 figures from File #BPH901116IC.



USABLE AREA CHANNEL 237C1

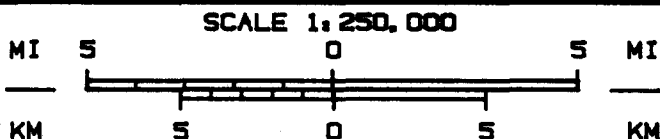
MAP IS A PORTION OF THE 1:250,000 SCALE
MOBILE ALABAMA EASTERN UNITED STATES
U. S. G. S. MAP.

MAP ASSUMES WQZB, THOMASVILLE, ALABAMA IS
OPERATING ON CHANNEL 238C3.

EXHIBIT #1

PETITION FOR RULE MAKING
STONE-LAMAR BROADCAST
SERVICES CORPORATION
SUB. CH 237C1 FOR 237C2
LUMBERTON, MISSISSIPPI

July 1992



BROMO
COMMUNICATIONS

St Simons Island, Georgia

BROADCAST
TECHNICAL CONSULTANTS

Washington, D. C.

**ALLOCATION STUDY FOR LUMBERTON, MISSISSIPPI
USING PROPOSED ALLOCATION SITE AS REFERENCE**

REFERENCE
30 39 34 N
89 09 59 W

CLASS C1
Current rules spacings
CHANNEL 237 - 95.3 MHz

DISPLAY DATES
DATA 06-24-92
SEARCH 07-22-92

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
WLUN.C	237C2	Lumberton	MS	345.0	20.37	224.0	-203.63 *
WLUN	237A	Lumberton	MS	319.4	36.80	200.0	-163.20 *
WKQB	238C	Jackson	MS	329.1	209.01	209.0	0.01 <
CP234	234A	Lacombe	LA	240.6	79.27	75.0	4.27
WMXZ	239C	New Orleans	LA	225.2	116.37	105.0	11.37
WKSJFM	235C1	Mobile	AL	84.7	103.14	82.0	21.14
WGUDFM	290C3	Pascagoula	MS	128.0	45.77	24.0	21.77
ALOPEN	237C3	Bayou Vista	LA	241.6	233.17	211.0	22.17
WQNZ.C	236C	Natchez	MS	293.8	233.49	209.0	24.49
WZMP	236C2	Marion	MS	13.8	189.58	158.0	31.58
WBBN	240C2	Taylorville	MS	344.6	111.95	79.0	32.95
KQKI	237A	Bayou Vista	LA	241.6	233.17	200.0	33.17
AD238	238C3	Thomasville	AL	47.4	181.56	144.0	37.56
WKSJFM	235C	Mobile	AL	91.4	145.67	105.0	40.67

CHANNEL 237C1 ALLOCATION STUDY

NOTE : ALLOCATION STUDY ASSUMES THAT WJDB
THOMASVILLE, ALABAMA IS OPERATING
ON CHANNEL 238C3.

EXHIBIT #2

**PETITION FOR RULE MAKING
STONE-LAMAR BROADCAST
SERVICES CORPORATION
SUB. CH 237C1 FOR 237C2
LUMBERTON, MISSISSIPPI
July 1992**

BROMO
COMMUNICATIONS
BROADCAST
TECHNICAL CONSULTANTS
St Simons Island, Georgia
Washington, D. C.

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

State of Georgia)
St. Simons Island)
County of Glynn)

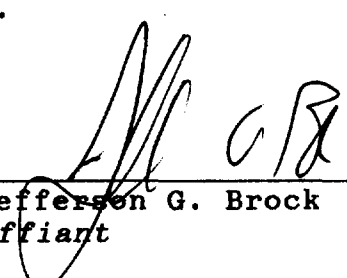
ss:

JEFFERSON G. BROCK being duly sworn, deposes and says that he is an officer of Bromo Communications, Inc. Bromo has been engaged by Stone-Lamar Broadcast Services Corporation, licensee of WLUN, to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 22nd of July, 1992.



Jefferson G. Brock
Affiant

Sworn to and subscribed before
me this the 22nd day of
July, 1992.



Notary Public, State of Georgia
My Commission Expires: September 8, 1995